

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Baltimore Division)**

MICHAEL C. WORSHAM,

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Plaintiff

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v.

* **Case No.: 1:16-CV-0600 GLR**

**MONITRONICS INTERNATIONAL,
INC., et al.**

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Defendants

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**REPLY IN SUPPORT OF
MOTION TO STAY PENDING TRANSFER TO MDL NO. 2493
BY THE JUDICIAL PANEL ON MULTIDISTRICT LITIGATION**

Defendant Monitronics International, Inc. (“Monitronics”), respectfully submits this reply in further support of its motion to stay all proceedings in this action pending its transfer to MDL No. 2493, *In re Monitronics International, Inc., Telephone Consumer Protection Act (TCPA) Litigation* (the “MDL”), currently pending before Judge Irene M. Keeley in the United States District Court for the Northern District of West Virginia.

Monitronics files this brief reply to note that plaintiff, Michael C. Worsham (“Worsham”), in his Opposition to Defendant Monitronics’ Motion to Stay (ECF No. 19), failed to address the legal standard that applies to this Court’s inherent power to stay a pending action. In particular, Worsham failed to allege what prejudice, if any, he would suffer if Monitronics’ motion to stay is granted. Instead, Worsham asserted frivolous arguments that are entirely irrelevant to the determination of whether a stay should be granted in this case.¹ As set forth in

¹ For the reasons stated in Monitronics’ Opposition to Plaintiff’s Motion to Remand (ECF No. 14), Monitronics refutes Worsham’s contention that this Court lacks subject matter jurisdiction over this case.

the opening memorandum of law in support of Monitronics' motion, a stay in this case is necessary and appropriate to achieve the judicial economies that underlie 28 U.S.C. § 1407.

WHEREFORE, based on the foregoing, defendant Monitronics International, Inc., respectfully requests that this Court stay all proceedings in this case pending its likely transfer to MDL No. 2493.

Date: April 22, 2016

/s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 22nd day of April 2016, a copy of the foregoing Reply in Support of Motion to Stay Pending Transfer to MDL No. 2493 by the Judicial Panel on Multidistrict Litigation, which was electronically filed and served via the Court's CM/ECF system, was served, via U.S. mail, first class, postage prepaid on: Michael C. Worsham, 1916 Cosner Road, Forest Hill, Maryland 21050.

Date: April 22, 2016

/s/

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